

EXHIBIT G

From: Chanler Langham <clangham@SusmanGodfrey.com>
Sent: Monday, January 11, 2021 6:01 PM
To: Huppert, Matthew R. <mhuppert@kellogghansen.com>
Cc: Adam Zapala <AZapala@cpmlegal.com>; Elizabeth Castillo <ecastillo@cpmlegal.com>; Floyd G. Short <fshort@SusmanGodfrey.com>; Jenna Farleigh <JFarleigh@susmangodfrey.com>; Marc Seltzer <MSeltzer@SusmanGodfrey.com>; Wojtczak, Richard A. <rwojtczak@SusmanGodfrey.com>; William V. Reiss <wreiss@robinskaplan.com>; Severson, Daniel S. <dseverson@kellogghansen.com>
Subject: [EXTERNAL] RE: Auto Parts MDL -- FRS Claims

Yes. That time works for me. Would you like to send the dial-in information?

From: Huppert, Matthew R. <mhuppert@kellogghansen.com>
Sent: Monday, January 11, 2021 4:56 PM
To: Chanler Langham <clangham@SusmanGodfrey.com>
Cc: Adam Zapala <AZapala@cpmlegal.com>; Elizabeth Castillo <ecastillo@cpmlegal.com>; Floyd G. Short <fshort@SusmanGodfrey.com>; Jenna Farleigh <JFarleigh@susmangodfrey.com>; Marc Seltzer <MSeltzer@SusmanGodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; William V. Reiss <wreiss@robinskaplan.com>; Severson, Daniel S. <dseverson@kellogghansen.com>
Subject: RE: Auto Parts MDL -- FRS Claims

EXTERNAL Email

Chanler,

Are you available at 2 pm ET tomorrow?

Matt

From: Chanler Langham <clangham@SusmanGodfrey.com>
Sent: Monday, January 11, 2021 2:41 PM
To: Huppert, Matthew R. <mhuppert@kellogghansen.com>
Cc: Adam Zapala <AZapala@cpmlegal.com>; Elizabeth Castillo <ecastillo@cpmlegal.com>; Floyd G. Short <fshort@SusmanGodfrey.com>; Jenna Farleigh <JFarleigh@susmangodfrey.com>; Marc Seltzer <MSeltzer@SusmanGodfrey.com>; Wojtczak, Richard A. <rwojtczak@SusmanGodfrey.com>; William V. Reiss <wreiss@robinskaplan.com>
Subject: [EXTERNAL] RE: Auto Parts MDL -- FRS Claims

Matthew,

I'm generally available tomorrow if you would like to meet. Please let me know what times work best for you.

However, it is not true that this is the first time you have been informed that claims submitted after the June 18, 2020 deadline will be treated as untimely. For one, the official claims website clearly states "The deadline to file a claim has passed. All claims must have been submitted online or postmarked by June 18, 2020." See www.autopartsclass.com. In addition, the declaration submitted by the claims administrator in response to your intervention motion says "Under this Court's Orders, the last day to submit a claim was June 18, 2020," and "any proof of claim information submitted now would be several months late and properly treated as untimely." ECF No. 2097 at Para. 11, 19.

Based on briefing concerning your intervention motion, you are also aware that Class Counsel repeatedly rejected any notion that FRS could submit "placeholder" claims that FRS would later supplement. ECF No. 2060-2 at Para. 5-9; ECF No. 2066 at 22. Thus, for claimants who identified no vehicle information before the claims deadline expired, and then identified vehicle information for the first time after the claims deadline expired, the submission of such claims are late and will not be allowed. Claimants who have previously submitted vehicle data and have some deficiency in the information or documentation that was submitted for those claims, may submit additional information to correct the deficiency. However, claimants who merely registered their name with no vehicle information, and did not identify the requisite vehicle information by the June 18, 2020 claims deadline have not timely submitted a valid claim, and late-filed claims will not be accepted. This is consistent with the declaration entered by the claims administrator in response to your intervention motion. ECF No. 2097 at Para. 13-19.

Regards,
- Chanler

CHANLER A. LANGHAM
PARTNER | SUSMAN GODFREY LLP

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713-377-2320 (MOBILE)
CLICK [HERE](#) FOR BIO

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From: Huppert, Matthew R. <mhuppert@kellogghansen.com>
Sent: Friday, January 8, 2021 4:27 PM
To: Chanler Langham <clangham@SusmanGodfrey.com>
Subject: Auto Parts MDL -- FRS Claims

EXTERNAL Email

Chanler,

The claims administrator in the End Payor Actions (Epiq) notified FRS for the first time on Wednesday, January 6 that “any data submitted after the claims deadline will be considered untimely.” We’d like to meet and confer with you about that announcement. Please let me know your availability early next week to discuss.

Thanks,

Matthew R. Huppert

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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